**From:** Mccall, Rickie
**Required Attendees:** Garcia, Bert; Hamilton, Karen; Spence, Sandra; Hoskie, Sadie; Colleen Rathbone; Mark Bostrum; Gemathieus@mt.gov
**Optional Attendees:** Bloom, Judy
**Location:** 5113_Granite/R08_Distributed_Rooms
**Importance:** Normal
**Subject:** State Water Director Nutrient Progress & Narrative MEETING W/MONTANA
**Start Date/Time:** Mon 2/3/2014 9:00:00 PM
**End Date/Time:** Mon 2/3/2014 10:00:00 PM

**NOTE: New NUMBER TO CALL**

[redacted]

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**Regional-State Senior Level Dialogue**
On Specific Near-term Actions to Reduce Nutrient Pollution

Increasing the Use of State Narrative Criteria & Designated Uses to Identify Impairments and Write TMDLs and Permits for Nutrient Pollution in States without Numeric Nutrient Criteria (NNC)

**Questions:**

(Note: we at EPA have a sense of what your response to these questions would be, but we think it's important to get your perspective without our bias. So consider these as a starting point to ensure some consistency in the discussion across states, even while we recognize that each state's approach is unique.)

- Does your State have narrative water quality standards that address implicitly or explicitly the impacts of excess nutrient pollution? What are they and what endpoints do they cover?

- Does your State have assessment methods to identify waters impaired by nutrient pollution using narrative criteria and/or designated uses? Has your State listed waters for nutrients using your narrative standards? Which waterbody types?

- Has your State issued TMDLs for nutrient pollution based on applicable

narratives? If so, what approach was used to set endpoints (e.g., N or P target concentrations) for the TMDL allocations?

- Does your State use its narrative water quality standards to determine the need for nutrient limits in NPDES permits?

    - If so, how does the state determine what the limits should be? Water quality-based or technology-based? [If technology-based: what basis -- state requirements?]

    - If not, is the state incorporating monitoring requirements for nutrient pollution in permits?

- When your State incorporates WQBELs for nutrients into permits, do you use any of the following to provide implementation flexibility?

    - Variances? [NOTE: the proposed new WQS regulation provides significant new information to consider regarding how variances can support strong interim progress towards reducing nutrient pollution while maintaining long-term goals for fully achieving WQS.]

    - Compliance schedules?

    - Staged implementation of TMDLs? [NOTE: this concept is about writing a TMDL to a water quality standard -- either numeric or translated from a narrative -- not an interim WQ goal. The TMDL writer then establishes TMDL assumptions and expectations that the load allocations in a TMDL will be implemented over a reasonable period of time. For example, in the Chesapeake Bay TMDL, EPA worked with the Bay States and DC, to establish an expectation that all practices and measures needed to implement the TMDL would be implemented over 15 years.]

- [If the answer is no: Are you willing to work w/ EPA to explore how these tools might help make stronger near-term progress on reducing nutrient pollution from point sources? What's a reasonable schedule for adopting/using them?]

- Are there other opportunities for making strong, near-term progress on reducing pollution in your state? How can EPA help you make more progress?